



Montana Department of
ENVIRONMENTAL QUALITY

Brian Schweitzer, Governor

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September 2, 2011

Rob Parker
EPA Region VIII – Mail Code 8EPR-B
1595 Wynkoop Street
Denver, CO 80202-1129

Subject: Smurfitt-Stone Mill Preliminary Assessment - DEQ Comments

Dear Rob:

Thank you for the opportunity to review and comment on the preliminary assessment. Following are DEQ's comments. Please let me know if you have questions or need additional information regarding any of the comments.

Comments:

1. Page 2, Section 3.1, 1st incomplete paragraph, last sentence: Please change "north longitude" to "north latitude" and "west latitude" to "west longitude".
2. Page 8, Table 1, Asbestos, Possible Contaminants: This column indicates that the possible contaminants are unknown for asbestos. It seems like the possible contaminant is asbestos. Perhaps this means the type and percentage of asbestos is unknown. Please clarify.
3. Page 8, Table 1, Asbestos, Disposal Locations: The preliminary assessment references two locations on the Smurfit Stone facility that received asbestos. These are listed (p.8-Table 1) as "Areas F,G". DEQ believes that the table should include additional onsite disposal locations for asbestos. In addition to these two, there is a 9/21/95 letter on file with DEQ that is a closure for three unlicensed landfill sites on the property. These three sites are described in the closure documents as "Pond A, Pond 6, and sites F & C". It is difficult to cross reference this 1995 site numbering to the current numbering system associated with the 2011 PA without further information. In addition to the two disposal sites listed in Table 1, there is indication that there may be as many as five additional sites where asbestos waste had been disposed of since 1990. However, the reliability of this information may prove difficult to confirm.
4. Page 8, Table 1, Wastewater, Approximate Volume Generated: Please correct the typo – "Ave" should be "Avg".
5. Page 18, Section 4.1.5, 1st incomplete paragraph: The waste water treatment system is not clearly explained in the report. Is it something that is connected to the treatment ponds or is it something different? Does it discharge through one of the identified

outfalls? Are leaks from the sewer lines possible sources of contamination? Please clarify.

6. Page 20, Section 4.2: This section should also identify and include a discussion of the on-site well field used by the facility as a water supply. DEQ's records do not indicate any issues with water quality when the supply was operational. These wells could be used in the future at the facility. If they are not going to be used in the future, they should be properly abandoned.
7. Page 21, Section 4.3, last paragraph, 2nd sentence: DEQ recognizes the impacts from mill tailings to the Clark Fork River drainage. However, the preliminary assessment states that arsenic, cadmium and other metals may be contaminants in sources at this facility. The preliminary assessment also indicates there are surface water and groundwater discharges from this facility to the Clark Fork River. Until there are upstream and downstream samples from the probably point of entry from this facility that indicate there are no metal impacts to the Clark Fork River, DEQ recommends changing "The metals are due to mill tailings" to "Some of the metals are due to mill tailings".
8. Appendix B, PA Report Form, Page 1 and Part of #5 on Page 2: It appears all of the boxes are filled with black indicating all apply, but it seems that some of them should be left blank since all of them do not apply. Please verify.
9. Appendix B, PA Report Form, Page 2, #6: Please verify that the contaminated soil does not need a source waste quantity statement.
10. Appendix B, PA Report Form, Page 3, #8, Primary Target Fisheries: It appears that the "No" box should be left blank. Please verify.
11. Appendix B, PA Report Form, Page 4, #9: Please verify that the answer is "No" to the presence of terrestrial sensitive environments. The soil exposure pathway section of the preliminary assessment identifies threatened and endangered species (as described in the surface water pathway).
12. Appendix D, Photo #2: Please double check the description of the photo. If the photographer was looking west, the river should appear behind the facility in this photo. Based on the features in the photo, it appears the photographer was looking east.

Sincerely,



Denise Martin

Site Response Section Manager

cc: Jon Dilliard - DEQ Public Water & Subdivisions Bureau
Doh Grimm - DEQ Asbestos Control Program
Chad Anderson - DEQ Enforcement Division
John Arrigo - DEQ Enforcement Division
Mike Trombetta - DEQ HWSCB
Sandi Olsen - Remediation Division Administrator
Judy Hanson - Permitting & Compliance Division Administrator



Re: Fw: Smurfitt Stone Mill Preliminary Assessment
Jeff_Miller
to:
Robert Parker
09/06/2011 04:00 PM
Hide Details
From: Jeff_Miller@URSCorp.com

To: Robert Parker/R8/USEPA/US@EPA

1 Attachment



Smurfitt.pdf

Hi Rob,
Thanks. I will begin incorporating those once I am done with the draft sampling plan, which I am hoping to get to Barry for an internal review this Thursday.
I will be looking for your comments this afternoon or tomorrow.

Cheers,
jeff

Jeff Miller - Senior Environmental Scientist
URS Operating Services, Denver, CO
303-291-8212 office - direct
720-810-0790 - cell

-----Parker.Robert@epamail.epa.gov wrote: -----

To: Jeff_Miller@URSCorp.com
From: Parker.Robert@epamail.epa.gov
Date: 09/06/2011 03:41PM
Subject: Fw: Smurfitt Stone Mill Preliminary Assessment

Jeff,

I have forwarded the comments received from DEQ. I will send you my comments either this afternoon or tomorrow (likely tomorrow), but I wanted to get you DEQ's comments sooner.

I gave these comments a quick look. Most are good to incorporate. I'm not sure how relevant their 6th comment is, since that area is thought to be upgradient and not the focus of our investigation, but those wells could be used to provide background...

Rob Parker
Site Assessment Manager, Environmental Engineer
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Email: parker.robert@epa.gov | Direct Phone: (303) 312-6664
----- Forwarded by Robert Parker/R8/USEPA/US on 09/06/2011 03:33 PM

From: "Martin, Denise" <demartin@mt.gov>
To: Robert Parker/R8/USEPA/US@EPA
Cc: "Dilliard, Jon" <jdilliard@mt.gov>, "Arrigo, John" <jarrigo@mt.gov>, "Anderson, Chad" <chada@mt.gov>, "Grimm, Deborah" <DGrimm@mt.gov>, "Hanson, Judy" <JHanson@mt.gov>, "Trombetta, Michael" <mtrombetta@mt.gov>, "Olsen, Sandi" <solsen@mt.gov>
Date: 09/02/2011 02:52 PM
Subject: Smurfitt Stone Mill Preliminary Assessment

Rob:

Attached are DEQ's comments on the PA. Thanks for the opportunity to comment and have a good weekend!

Denise

(See attached file: Smurfitt.pdf)

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